

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE PHARMACEUTICAL INDUSTRY) MDL No. 1456
AVERAGE WHOLEALE PRICE) Master File
LITIGATION) No. 01-12257-PBS
_____) Judge Patti B. Saris
)
THIS DOCUMENT RELATES TO)
City of New York, et al.)
v.)
Abbott laboratories, et al.)
_____)

30(b)(6) DEPOSITION OF ETHEX (CHRIS KEITH)

Taken on behalf of the Plaintiffs

June 24, 2008

*** HIGHLY CONFIDENTIAL ***

1 2002.

2 Q. Okay. Thank you. And for the record, if
3 you'll flip through this document, you'll see, Mr.
4 Keith, that the award appears to concern a number of
5 Ethex products, but among them is the Isosorbide
6 Mononitrate 60-milligram tablets that is the subject
7 of today's deposition. If you would take a moment
8 just to confirm that for me.

9 A. Yes.

10 Q. And what is OptiSource?

11 A. Excuse me. It is a group of smaller
12 independent wholesalers that have kind of banded
13 together to form a single group to, you know, leverage
14 their purchasing power. It's a source program among
15 probably 14 different wholesalers at the time.

16 Q. Okay. And so the prices -- the prices that
17 we see reflected in here would be available to all the
18 participating wholesalers; is that correct?

19 A. That's correct.

20 Q. And this particular deal with OptiSource was
21 agreed to; isn't that right?

22 A. It appears to be, yes.